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11 Attorney for the State

VALEPIE WYANT CLERK

19 JAN 25 PM 3:48

MA

12 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
13 **IN AND FOR THE COUNTY OF COCONINO**

14 STATE OF ARIZONA,

15 Plaintiff,

16 vs.

17 JAMES JOSHUA WOMBLE,

18 Defendant.

No. CR2017-00886

19 **NOTICE OF RULE 15.1(b)**
20 **DISCLOSURE BY THE STATE**

(The Honorable Mark Moran -
Division 3)

21 Pursuant to Rule 15.1(b) of the Arizona Rules of Criminal Procedure, the State of
22 Arizona hereby provides the following disclosure:

- 23 (1) **The names and addresses of all persons whom the prosecutor**
24 **intends to call as witnesses in the case-in-chief. See the**
25 **police reports for witness address:**

26 **NAME**

Det. Brad Conway, Flagstaff Police Department
Det. Todd Martinet, Flagstaff Police Department
Det. Mike Slayton, Flagstaff Police Department
Det. Ryan Turley, Flagstaff Police Department
Officer A. Chirvosky, Flagstaff Police Department
Officer M. Murray, Flagstaff Police Department
Det. Nick Jaconellis, Flagstaff Police Department
Det. Carlson, Flagstaff Police Department
Cpl. Laughlin, Flagstaff Police Department

Sgt. Kelly, Flagstaff Police Department
Det. Knott, Flagstaff Police Department
Off. Colton Hutchinson, Flagstaff Police Department
Owen Sexton
Tyler Coker
Kevin Kirkley
Lynn Braine
Ethel Standlee
Susan Knelsel

And any witness listed by the defendant. This witness list may be supplemented at a later date.

(2) All statements of the defendant and of any person who will be tried with the defendant:

All of the Defendant's statements which have been recorded, reduced to writing, or of which a transcript is available are in the disclosure materials.

(3) All original and supplemental reports prepared by law enforcement agency in connection with the particular crime with which the defendant is charged.

The State's disclosure includes initial and supplemental police reports, witness statements, scientific examination reports of experiments or comparisons that have been completed, and all other documents bearing **Bates Stamp Nos. 1 to 561**, as previously disclosed and/or attached hereto.

Audio: 911 Dispatch Recordings; caller James Womble -	CD
Video: Body cam recording – first aid to P. Gillepsie	DVD
Video: Body cam recording & photos	DVD
Video: Body cam recording - T. Coker	DVD
Video: Interview of J. Womble	DVD
Video: Interview of T. Coker	DVD
Audio: Interviews of J. Womble & T. Coker	CD
Video: Body cam footage	DVD
Video: Body cam footage	DVD

1	Video: Body cam footage	DVD
2	Video: Interview of O. Sexton	DVD
3	Audio: Interview of O. Sexton	CD
4	Search warrant photos/video	DVD
5	Video: Bank of America ATM	DVD
6	Video: 2 nd Interview of O. Sexton	DVD
7	Video: 2 nd Interview of T. Coker	DVD
8	Audio: 2 nd Interview of T. Coker	CD
9	Audio: Interview of Abigail Terry	DVD
10	Audio: Interview of K. Kirkley (lives at 202 S. Agassiz)	CD
11	Audio: Interview of J. Rolston (Gillespie girlfriend)	CD
12	Audio: K. Kirkley	CD
13	Audio: 1 st Interview of O. Sexton	CD
14	2 nd Interview of O. Sexton	CD
15	Audio: Interview of Tim Marron	DVD
16	Audio: Interviews with Gillespie's Sisters	DVD
17	Photos:	
18	Owen Sexton, Tyler Coker & James Womble. Front of residence	CD
19	P. Gillespie	DVD
20	Autopsy photos	DVD
21	Audio: Interview of Brian Grant	DVD

(4) **The names and addresses of experts who have personally examined a defendant or any evidence in the particular case, together with the results of physical examinations and of the scientific tests, experiments or comparisons that have been completed.**

The State will use the testimony of any expert witness whose report is included in the disclosure materials, or who is otherwise mentioned in the disclosure materials. The State may also call Arizona Department of Public Safety Crime Lab criminalists to provide expert testimony, to wit:

NAME

ADDRESS

Dr. Lawrence Czarnecki,

2500 N. Fort Valley Road, Flagstaff, AZ

Melissa Verhaghe, AZDPS

Northern Regional Crime Laboratory

Mary Martinez, AZDPS

Northern Regional Crime Laboratory

- 1 **(5) A list of all papers, documents, photograph or tangible objects**
2 **that the prosecutor intends to use at trial or which were**
3 **obtained from or purportedly belong to the defendant:**

4 The State will use any items listed in or referred to in the disclosure materials,
5 the Indictment and Grand Jury Transcript, or in the Information and Preliminary Hearing
6 Transcript. Such disclosure includes the following:

7
8 **CONTROLLED SUBSTANCE LAB REPORT**

9 **BLOOD ANALYSIS LAB REPORT**

10 **PHOTOS**

11 **DIAGRAMS**

12 **AUDIO RECORDINGS**

13 **CLOTHING**

14 **ILLEGAL DRUGS**

15 **VIDEO RECORDINGS**

16 **CHARTS**

17 **DRUG PARAPHERNALIA**

18
19 All items are available for inspection at the Coconino County Attorney's Office, or
20 the office of the appropriate law enforcement agency, pursuant to Rule 15.1(e).

- 21
22 **(6) A list of all prior felony convictions of the defendant which the**
23 **prosecutor intends to use at trial.**

24 None

- 25 **(7) A list of all other acts of the defendant which the prosecutor intends**
26 **to use to prove motive, intent, or knowledge or otherwise use at trial.**

 None at this time, the State reserves the right to supplement at a later
 date should any other act evidence will be used.

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1 (8) All material which tends to mitigate or negate the defendant's
2 guilt as to the offense charged or which would tend to reduce
3 the defendant's punishment therefore.

4 None known at this time

5 (9) Electronic surveillance of any conversations to which defendant was
6 a party or of the defendant's business or residence.

7 None

8 (10) Search warrants executed in connection with this case.

9 SW2017-00120

10 SW2017-00121

11
12 (11) Informant information, subject to Rule 15.4(b)(2).

13 None in this case.

14
15 RESPECTFULLY SUBMITTED this ____ day of January, 2019.

16
17 WILLIAM P. RING
18 COCONINO COUNTY ATTORNEY

19
20 By 
21 Marc Stanley
22 Deputy County Attorney
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COPY of the foregoing
mailed/delivered this
25th day of January, 2019,
to:

The Honorable Mark Moran
Division 3
Coconino County Courthouse
Flagstaff, AZ 86001

Adam Zickerman
Attorney for the Defendant

By: _____

